

file SOH10
Increment II

Mail Stop 521

SEP 12 1979

Mr. Delfim Dias
Environmental Engineer
Sohio Petroleum Company
3111 'C' Street
Anchorage, Alaska 99502

Dear Mr. Dias:

In response to your letter of August 3, 1979 we have evaluated the enclosed major points concerning the preparation of a PSD (PSD) application for the Waterflood and non-Waterflood heater and turbine project. The following points have been addressed to clarify our interpretation of the issues raised in your letter of August 3, 1979.

Item # 2 If the source is subject for hydrocarbons under existing regulations, the impact of these hydrocarbon emissions on ambient ozone levels will have to be estimated to demonstrate that the NAAQS for ozone will not be exceeded. Rob is not aware of a "standard non-reactive" model that can make this estimate. In addition, monitoring for ozone will be required to establish existing levels. A minimum of four months (including June through September) of monitored data is required.

Item #5 Current EPA policy is to use 70% of the result of standard Briggs plume rise equations to estimate plume rise from stationary gas turbines. Technical justification is required for use of any other method to estimate plume rise. (John McKee of Radian is aware of the details of current Region 10 policy on this issue.)

Item #7 The Turner stability class method for estimating dispersion and its appropriateness for application to the meteorological conditions at Prudhoe Bay was discussed. Our position is that we can not argue against the use of this method for Prudhoe Bay because at this time we have no technical support for the use of some other method. Another item we discussed was the appropriateness of using CDM for annual impact estimates. Radian is aware that Region 10 is interested in seeing a discussion of why CDM (clearly an urban model) is appropriate for application to Prudhoe Bay (clearly a rural area). A discussion of the appropriateness of a model for a given application should be included as part of a PSD application.

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ENVIRONMENTAL PROTECTION AGENCY

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If you have any questions please feel free to contact Ray Nye of my staff at 206-442-7176 or Rob Wilson at 206-442-0887 concerning meteorological applications.

Sincerely,

Michael M. Johnston, Chief
New Source Permits Section

cc: Tom Hanna
Bob Chivvis
Pat Metz

bcc: Bob Courson

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CONCURRENCES

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